

Comments submitted to the NOSB on the Handling Committee's recommendation that "colors, nonsynthetics sources only" [sic], be renewed on the National List.

The NOSB Handling Committee has recommended that "colors, nonsynthetics sources only" [sic] be renewed on 205.605(a).

I would like to point out that colors were placed on the National List without a recommendation from the NOSB, as required by OFPA. Since colors were never recommended by the NOSB, there has never been a determination by the Board that such substances meet all of the evaluation criteria as stated in OFPA and section 205.600(b) of the Final Rule.

If the NOSB is to recommend that nonsynthetic colors be added to the National List, then the material evaluation forms must first be completed and posted for public comment. The Handling Committee must demonstrate that nonsynthetic colors meet evaluation criteria, since there is no record that the substances adhere to the legal and regulatory criteria.

I urge the NOSB to defer approval of nonsynthetic colors until complete evaluation forms have been submitted by the Handling Committee and posted for public comment.

Respectfully,

Jim Riddle